

APPENDIX A

NOTICE OF VIOLATION

Duquesne Light Company
Beaver Valley Power Station, Unit 2

Docket No. 50-412
License No. CPPR-105

As a result of the inspection conducted on September 1 - October 1, 1982, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C) published in the Federal Register on March 9, 1982 (47 FR 9987), the following violation was identified:

10 CFR 50, Appendix B, Criterion III, requires that measures shall be established to assure that applicable design bases, as specified in the license application, are correctly translated into specifications, drawings, procedures, and instructions. Also, design changes, including field changes, shall be subject to design control measures commensurate with those applied to the original design. This requirement is implemented by Chapter 17 (Quality Assurance) of the PSAR paragraph 17.2.1.3A, Design Control which states; "The Duquesne Light Company Quality Assurance Program provides that measures . . . are established for the identification and control of design interfaces . . . and shall provide the verifying and checking of the adequacy of design . . . areas that will be systematically evaluated shall include: Suitability of application of materials, parts, equipment, and processing.

The responsibility for design control during the engineering and construction phase is delegated to Stone and Webster as agents for Duquesne Light Company . . ."

Contrary to the above, inadequate design control was exercised in that, on September 14, 1982, HVAC support drawings had been released to construction with tolerance dimensions for Hilti bolt spacing installation closer than supported by design calculations. Also, HVAC support DSA 207 had been installed by Hilti bolt connections without any design calculations performed. Furthermore, because of field changes made without design review, HVAC supports were installed with Hilti bolt connections rather than attachments to embeds without the drawings being changed to show the as-built condition.

This is a Severity Level IV violation (Supplement II).

Pursuant to the provisions of 10 CFR 2.201, Duquesne Light Company is hereby required to submit to this office within thirty days of the date of the cover letter to this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending your response time.